

July 13, 2014

Mr. Charles David Abshire (6SF-AP)
Remedial Project Manager
U.S. Environmental Protection Agency
Region 6
1445 Ross Avenue
Dallas, TX 75202-2773

RE: June 2014 Monthly Report
United States of America and State of Texas v. Alcoa, Inc., et al.; CA No. 3:12-cv-00210
Malone Service Company Superfund Site - Texas City, TX

Dear Mr. Abshire:

The Malone Cooperating Parties (MCP) submit the Monthly Report for June 2014 in compliance with the Consent Decree and Statement of Work for Remedial Design/Remedial Action (RD/RA) at the Malone Service Company Superfund Site in Texas City, TX.

Should you have any questions, please contact me at 919-539-1928 or bobp@projectnavigator.com.

Sincerely,

R Piniewski

Robert Piniewski
Project Coordinator

cc: Marilyn Long - TCEQ
Malone Cooperating Parties

**MALONE SERVICE COMPANY SUPERFUND SITE
MONTHLY PROGRESS REPORT FOR JUNE 2014
SUBMITTED JULY 13, 2014**

1) SUMMARY OF WORK PERFORMED IN JUNE 2014

- a) Project Navigator Ltd., ENTACT and MCP representatives mobilized on April 7, 2014 to begin Phase One RA work. Work conducted during June included:
 - (1) Solidification Pilot Study Work
 - (2) Building and concrete demolition
 - (3) Slurry wall installation
 - (4) Preparation for installation of dewatering system
 - (5) Preparation for Phase Two Basis of Design Meeting at the Site
- b) EnSafe, the MCP Independent Quality Assurance Team (IQAT) contractor observed Phase One RA work.
- c) MCP representatives continued efforts on the cemetery relocation work.
- d) MCP representatives began injection well rehabilitation and continued work on reissuance of the No Migration Exemption. MCP representatives submitted revised procedures for the rehabilitation of WDW-138 and EPA approved the revised procedures.
- e) MCP representatives continued stormwater management activities at the Site.

2) SUMMARY OF SAMPLING/TESTING RESULTS

- a) Sampling was performed on multiple tasks as defined in the Phase One RA Work Plan and results will be provided in future reports or plans as required by the SOW.

3) DELIVERABLE STATUS & MODIFICATIONS TO PLANS

- a) A summary of the most recent Agency Communication is shown in Table 1.

4) POTENTIAL PROBLEM AREAS and ACTIONS TO BE TAKEN

- a) The ongoing injection well rehabilitation has encountered problems with downhole work and its completion has been delayed. EPA has reviewed and approved new rehabilitation procedures.

5) COMMUNITY RELATIONS ACTIVITIES

- a) MCP representatives will support EPA's community relations efforts as requested by EPA.

6) CHANGE IN PERSONNEL OR OPERATIONS

- a) None.

7) SCHEDULE

- a) The Phase One RA Work Plan contains the project schedule. The ongoing injection well rehabilitation has encountered problems with downhole work and its completion has been delayed.

**8) PROJECTED WORK FOR NEXT TWO REPORTING PERIODS
(JULY and AUGUST 2014)**

- a) Continue Phase One RA work.
- b) Continue Cemetery Relocation efforts for reinterment.
- c) Continue stormwater management activities at the Site.
- d) Conduct Basis of Design Meeting for Phase Two RD/RA Work Plans
- e) Prepare draft Phase Two RD/RA Work Plans

- f) Complete WDW-138 and WDW-73 Rehabilitation Work Over Procedures. Conduct Mechanical Integrity Test and Temperature Log for WDW-138 and WDW-73 once rehab activities are complete
- g) Prepare the petition for renewal of the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells.

Table 1
Recent Agency Communication Summary
Malone Service Company Superfund Site – Texas City, TX

Date	MCP Communication Summary	Response From EPA Date	EPA Communication Summary	Notes
10/16/13	Via email the MCP, under Section XIX (Force Majeure) of the governing Consent Decree, notified EPA that due to the government shutdown and other circumstances there would be a delay in the submission of the Phase One RA Work Plan. The MCP will provide the information prescribed by Paragraph 74 of the Consent Decree once the government shutdown has ended and the MCP has been able to consult with EPA regarding various technical issues and the schedule going forward.	pending		
12/9/13	Submitted written request for approval for 45 day schedule extension for submittal of the draft Phase One Remedial Action Work Plan due to the Government shutdown.	pending		
12/20/13	Submitted draft Phase One Remedial Action Work Plan and appendices including the Phase One Remedial Design Investigation Report.	1/31/14	EPA comments received on 1/31/14.	
1/31/14	MCP received EPA and TCEQ comments on Phase One Remedial Action Work Plan	n.a.		
2/13/14	PNL notified EPA that in response to a petition filed by representatives of the MCP the Galveston County District Court ordered that any remains in the cemetery at the Malone Site be removed to a perpetual care cemetery. The court also ordered removal of the cemetery dedication. Further permits will be obtained from the State Registrar as needed.	Noted.	MCP provided EPA a copy of the Court Order on March 6, 2014.	

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2/19/14	MCP representatives and EPA discussed the MCP's intent to prepare a petition to renew the No Migration Exemption (from hazardous waste land disposal restrictions) for operation of the injection wells, and to perform well rehabilitation at WDW-73 and WDW-138 to increase injection capacities to permitted levels. The MCP also requested postponement of Mechanical Integrity Testing (MIT) and 5 year temperature log testing until after well rehabilitation work is complete. EPA requested a review of well rehabilitation procedures and agreed to postpone MIT and 5 year temperature log until after the rehabilitation	2/19/14	EPA requested a review of well rehabilitation procedures and agreed to postpone MIT until after the rehabilitation.	
2/20/14	The MCP notified EPA that it has completed the second required payment of \$12 million to the Malone Site Trust (held by Bank of New York Mellon) pursuant to Section 3(b) of the Malone Service Company Superfund Site Trust Agreement.	n.a.		
3/3/14	The MCP submitted its responses to Agency comments on the draft Phase One Remedial Action (RA) Work Plan.	3/4/14	EPA approved the response to comments via email.	
3/4/14	The MCP received information from EPA to facilitate the approval/reissuance of the No Migration Exemption for the injection well.	n.a.		
3/6/14	The MCP submitted a copy of the order of the Galveston County District Court granting our motion for summary judgment on the petition for removal of remains and removal of the cemetery dedication regarding the cemetery area at the Malone Site.	n.a.		
3/10/14	The MCP submitted the Final Phase One RA Work Plan and Storm Water Management Plan V1.	3/25/14	EPA approved the Phase One RA Work Plan.	

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3/25/14	The MCP notified EPA and TCEQ that ENTACT will mobilize to the Site on April 7, 2014 to begin Phase One RA work and that MCP representatives will also be mobilizing on April 7, 2014 to begin cemetery relocation work.	n.a.		
4/7/14	The MCP submitted a request to shift the installation of the dewatering system and slurry wall from Phase Two to Phase One RA work. The early install of these remedy elements will allow the MCP to begin dewatering sooner and improve solidification efforts.	4/10/14	EPA approved the request.	
5/9/14	The MCP submitted the injection well rehabilitation procedures for the injection wells at the Site.	5/29/14	EPA approved the procedures.	
6/12/14	The MCP submitted revised injection well rehabilitation procedures for injection well WDW-138.	6/13/14	EPA approved the revised procedures.	